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## UNITED STATES DEPARTMENT OF THE INTERIOR FISH AND WILDLIFE SERVICE

FISH AND WILDLIFE ENHANCEMENT

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November 21 1991

## IN REPLY REFER TO

Mr David P Simonson Assistant Manager for Environmental Management U S Department of Energy Rocky Flats Office Golder CO 80402-0928

Dear Mr Simonson

The U S Fish and Wildlife Service (Service) has revewed the document entitled Endangered Species Act Compliance Proposed South Interceptor Ditch (SID) Mainterance Project Final Biological Survey Report submitted by the U S Department of Energy (Energy) Rocky Flats Office Golder CO The Service finds the subject document to be adequately compiled and consistent with the requirements and intent of Section 7 of the Endangered Species Act (16 U S C 1531 et seq ) and offers the following comments and recommendations

Trom the subject document we understand that planned maintenance of the South Interceptor Ditch (Ditch) will take place in two phases The near-term phase consists of burning existing vecetat\_on within the channel of the Ditch to improve flow rate The second phase of work will involve excavation and dredging of the channel to return the hydrodynamics of the Ditch to its only the burning phase of the work

We offer the following specific comment for your consideration

Section 5.1 Direct Impacts, p 7. ¶3 states Excavation of the charnel and re-building of control structures will result in the total destruction of all habitats along the length of the SID channe. Because similar habitat is available in the immediate vicinity loss of this particular habitat is not anticipated to have any long-term direct irpact on species that currently utilize it

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Existing wetland rabitat values in the area within the channel of the Ditch and existing transitional rabitat from wetland to upland values adjacent to the Ditch have been enhanced by sedimentation and ensuing natural succession of vegetation. Loss of those habitat values in particular because they occur on a south aspect slope may affect opportunities for endangered species. The Service recommends that future endangered species evaluations address the sum of lost habitat values that may be adversely impacted by eventual phases of work on the Ditch and for all other planned/pending remedial and cleanup work in the 881 Hillside area

Based on the data presented the Service does not oppose the plan by Energy for maintenance burning of vegetation within the confines of the South Interceptor Ditch channel. The Service concurs with the determination by Dierry that burning the Ditch as outlined in the document does not result in a "may affect" determination for currently listed endangered species and Species of Concern as defined in the subject document. However, the Service requests that Energy contact us about potential endangered species concerns for subsequent phases of this project and other remedial/cleanup actions under consideration for the 881 Fillside.

Please call John Wegrzyn or Andrew Archuleta at (303) 231-5280 if you have questions or require further assistance. Thank you

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LeRoy W Carlson

Colorado State Supervisor

JGW ASA LRD

cc FWS/FWE SLC
CDOW-Central Region (Attn Dave Weber)
USIPA Region VIII (Attn Martin Hestmark)
Reading File
Project File

FWE/CO DOE-RFO/ESA RFP-SID1 WPF